

Aaron Hansome

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June 17, 2025

The Honorable Hal R. Ray, Jr.

United States Magistrate Judge

Northern District of Texas

Fort Worth Division

Re: Submission of Supplemental Exhibit A-25 – Bland v. 1st Texas Health & Life LLC et al., Case No. 4:24-cv-01022

Dear Honorable Judge's O'Connor and Ray, Jr.:

Please find enclosed **Exhibit A-25**, submitted in support of Defendant Aaron Hansome's *Motion to Compel Discovery Responses and for Supplemental Evidentiary Submission*. This exhibit consolidates newly discovered facts obtained after Plaintiff's production, including:

- Screenshots and WhatsApp messages referencing Plaintiff's witness, Mr. Wes Newman;
- Email threads between Mr. Newman and Defendant;
- Vendor statements referencing litigation coordination or communication with Mr. Newman.

These records are relevant to questions of traceability, standing, and witness credibility, and directly support Defendant's argument that compelled discovery is necessary to properly assess the claims presented.

This submission is offered without prejudice and in full compliance with the Local Rules governing evidentiary submissions and formatting.

Respectfully submitted,

Aaron Hansome



Aaron Hansome

Pro Se Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2025, a true and correct copy of the foregoing cover letter and **Exhibit A-25** were filed and served via the Court's ECF system and were additionally emailed to:



Kelly Bland

Plaintiff, Pro Se

kellybland516@gmail.com

/s/ Aaron Hansome



Aaron Hansome



Abdul Hadi


last seen today at 4:23 PM

Page 1 of 1




A-25 Defendant's WhatsApp messages
Forwarded from Abdul (AKA Mark)
ending up in Plaintiff's Discovery.

April 19, 2024

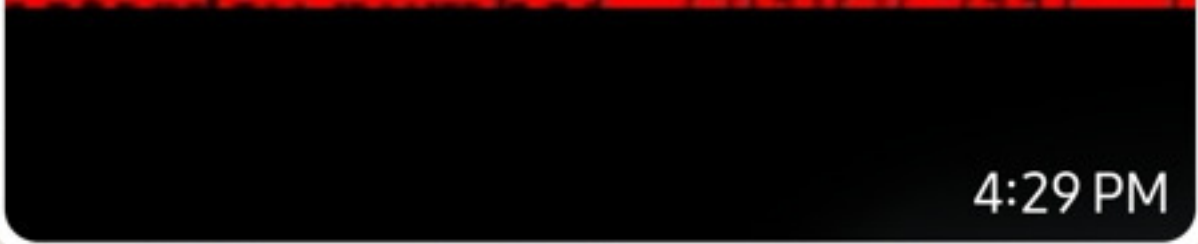
 Messages and calls are end-to-end encrypted. No one outside of this chat, not even WhatsApp, can read or listen to them. Tap to learn more.

Hiiii 4:28 PM

Forwarded



02/21/2024	0208001090
02/21/2024	8179032161
extended number	6040252445





4:29 PM

Forwarded

You sent this phone number on the 21st of February

4:29 PM

Forwarded

That is the lady that is suing us

4:29 PM

A-25 Defendant calls Mark Curtis (AKA Abdul Hadi) of Global Calls on June 8, 2025 to ask how Plaintiff received calls intended exclusively for him.

Abdul Hadi (Mark) 00:26

Hello,

Aaron Hansome 00:27

Hey, Mark, how you doing?

Abdul Hadi (Mark) 00:31

I'm good. How are you?

Aaron Hansome 00:32

Good, good Abdul.

Aaron Hansome 00:33

I hope you're enjoying your holiday.

Aaron Hansome 00:37

So that that recording? Yeah, that recording, I sent that, that recording directly to you. It was sent. It was sent to your personal WhatsApp. So I'm wondering how she got that recording. The recording belong to you.

Abdul Hadi (Mark) 00:58

I just send you a [unintelligible] screenshot right now on the WhatsApp. I personally don't have the recording. So how she have?

Aaron Hansome 01:08

Well, I mean, it's, it's, it's to your, [overlapping voices] it's directly to you.

Abdul Hadi (Mark) 01:14

I don't know. I don't have the chat history. I in my whatsapp album. So how will she have? And I don't know is she I don't have the number. I don't have the bloody number. I don't know her name. I think you told me sometime, but I don't remember in my mind,

Aaron Hansome 01:32

yes.

Aaron Hansome 01:33

So she's got two different recordings, one one saying that she has a bunch of evidence, and the other one saying that she's demanding \$8,000

Aaron Hansome 01:42

And I don't know,

Abdul Hadi (Mark) 01:44

okay,

Abdul Hadi (Mark) 01:44

oh, do you have her number? You have a number?

Aaron Hansome 01:47

Yeah, yeah, yeah, I have her number. And apparently I had found, well, apparently I had found where your company at the time, had sent her her call a prior time. I have to, I'll have to look at it, but it appears that I found where your company had also sent her call to me, and look at it, but it appears that I found where your company had also sent her call to me, and along with P TECH. So, so P TECH was the Amjad, was the guy that sent her call over that then, you know. But beyond any doubt was, was the guilty party on April the 10th, when we called, he sent, he sent her list over, but, but you had sent her at a prior time as well, apparently. And I was, I was, anyway, yeah, so I'll take a look at it and and see but, but, bro. Like, this, this, it almost seems like you have to be working with her mark, because this is your this is your personal WhatsApp, and this is your personal recording that I sent directly to you that was not even in, that wasn't even in a group chat, bro, that was directly to you, and now she's got a recording directly to you.

Abdul Hadi (Mark) 03:07

I understand. Send me her number. Make sure you can send me her WhatsApp number. So what I can do, I can directly call her tomorrow, and I'll talk to her.

Aaron Hansome 03:20

Well, I mean,

Abdul Hadi (Mark) 03:21

I will recall everything.

Aaron Hansome 03:22

Well, it's way beyond that. I mean, she sued me in federal court, bro, it's way, way beyond that. So this is all stuff that's being submitted to federal evidence now, federal court evidence

Abdul Hadi (Mark) 03:32

I didn't send, yes, I didn't send any kind of recording, and I'm able to defend anywhere if you want me to join

directly to zoom or anything on the [unintelligible] I'll be able to do that. Anything you want me to do, I'll be able to do that for you. Because I didn't done and it's our personal conversation, and I didn't send, I don't know her. I didn't I don't have her number as well.

Aaron Hansome 04:02

Yeah, no, I don't know how she would have got it, unless somehow she had some sort of a phone tap or something. I don't know how she would have got it.

Abdul Hadi (Mark) 04:13

Yeah, send me her number. I will call her directly, and I will record everything, and I'll send you. I'll send to you then.

On June 9 2025, the day after the phone call, Vendor Abdul Hadi (AKA Mark Curtis) references Mr. Newman when asked again (this time in WhatsApp) how Plaintiff came to possess private conversations

[12:47 PM, 6/9/2025] Aaron Hansome: This lawsuit is from the Southern District of Ohio,

where they were trying to help another litigator win a lawsuit "Schwartz"

[2:42 PM, 6/9/2025] Mark Curtis (AKA Abdul Hadi): I have conversation with this person before

[2:43 PM, 6/9/2025] Mark Curtis (AKA Abdul Hadi): Through my friend

[2:43 PM, 6/9/2025] Mark Curtis (AKA Abdul Hadi): And I'm calling to this person again

[2:43 PM, 6/9/2025] Aaron Hansome: Don't call anyone

[2:43 PM, 6/9/2025] Aaron Hansome: It's already in Federal court

[2:43 PM, 6/9/2025] Mark Curtis (AKA Abdul Hadi): His name is wes.

[2:43 PM, 6/9/2025] Aaron Hansome: They are not going to be truthful with you Abdul

[2:44 PM, 6/9/2025] Aaron Hansome: Yes, Wes Newman

[2:44 PM, 6/9/2025] Mark Curtis (AKA Abdul Hadi): Yes

A-25 Vendor Amjad (AKA P-Tech) referencing Mr. Newman on May 21, 2024 when discussing Plaintiff's and Mr. Newman's demand emails

[5/21/24, 9:47 AM - Aaron]: Good afternoon, commission reports come out on Thursdays. Is that what you're referring to?

[5/21/24, 9:48 AM - Amjad P-Tech]: Yes but last weeks report and payment is pending

[5/21/24, 9:49 AM - Aaron]: Last week you only had a few sales, and while we issued a \$50 credit to everyone sales, you've brought me some litigators to pay off

[5/21/24, 9:50 AM - Amjad P-Tech]: 1 litigator that also was not a transfer.

[5/21/24, 9:50 AM - Amjad P-Tech]: Wes is handled

[5/21/24, 9:50 AM - Amjad P-Tech]: Just need to pay him but he has not sent an account yet so we are good

[5/21/24, 9:50 AM - Aaron]: We didn't get any commissions for reconciliation last week. We won't know anything about the prior sales until Thursday.

[5/21/24, 9:51 AM - Amjad P-Tech]: Wes is tkaing information from me regarding his larger law suits
He genuinely doesnt care
About us or the call we sent him

[5/21/24, 9:51 AM - Amjad P-Tech]: Ok

1st Texas Health & Life | Wes Newman DNC

Wes Newman <wes.newman86@gmail.com>
To: "support" <support@1sttexasnational.com>

Sun, Apr 21, 2024 at 10:52 AM

Hi Aaron,

I am reaching out about calls I have received on my cell phone, 940-631-4523, which has been on the national DNC list since July 2005. I have provided details on the call that was transferred to your company below, though I have had many other calls using the same script and process that were not transferred for various reasons.

Call from 940-442-6324 on 4/18 at 12:57p CT. I picked up and said hello, it was silent for a second or two before a "boop" sound played, then there was call center background noise for about 10 seconds. I finally said, "Yes?" Finally someone responded after about 15 seconds and asked how I was doing. This person then told me that they were "Sam Cooper, a senior verification officer," but they never provided me with their company name at any point on this call. He told me he had a "big surprise" for me. He asked if I had received my subsidy card for 2024 or if I was still waiting for it. I asked him what that subsidy card looked like. He explained what a subsidy was and how it can be used, but did not explain what the card looked like. I asked again and he said it "Looked uh like a card. Ok?" I then asked when they sent it, to which he told me they would send it in 2 days to my mailing address, which he now needed me to tell him. I continued asking when they sent the card, whether they had sent it, where they sent it, etc, but he never had an answer, which implies that this is essentially a phishing call, as no card has ever been sent and they know this. "Sam" asked several qualifying questions. When he asked again for my mailing address, I again questioned how I could have received anything if he didn't even know my address. His response was, "No, no, no, no, no. I'm asking you. I'm not asking you. Your subsidy card, I say. You can qualify ok?" (I understood this to be a denial of asking if I had received my card and instead that he had said he could see if I qualified). The call throughout was pretty contentious, as he would get offended at any question I asked him about the card he must have sent. After answering his qualifying questions, he told me he "has a best friend that is also from your area. He will ask you, "Are you looking for free health coverage?" You just need to tell them, "Yes." And he will show you what's the carrier name, what kind of you have coverage. He will put your name on your new subsidy card and he will send you again. Ok?" He then started to transfer me. Some music played before someone joined the call saying, "Health and Life. Are you looking for free health coverage?" No name or accurate company name was given. I told him yes and that I was looking for my subsidy card. This agent told me that I would need to contact my carrier for that. I responded letting him know that the call center told me that it was him that would give that to me. "Sam" then jumped back onto the line to explain that I needed to answer differently. "Sam" also told me that I just needed to answer 2 questions and then I'll get the subsidy. He told me again that his "best friend" will get on the line to give me the subsidy. I again heard the same hold music before the same agent eventually joined the call. I was given the same "Health and life" intro, but this time I answered "Yes" to his question. He responded by saying either "Again," or "Look man," it was unclear. He then left the call. "Sam" came back on the line about 20 seconds later to say, "Bro, do you have any alternate number? Actually we are getting a little bit connectivity issue because your number registered in blacklisted, do not call registry, do not calls state, litigator, that's why I am asking. Do you have any alternate number." I then gave him my VOIP number so that I could track down who the caller is.

Call to my VOIP from 817-431-1614 on 4/18 at 1:06p CT. I picked up and "Sam" was already on the line. He needed some of my info again. After about 3 minutes, he again told me he had a best friend in my area. This time he told me that I would be asked if I am looking for additional benefits, which I would need to tell them no, and instead say that I am looking for new coverage so that I can get a subsidy. After 3.75 minutes, he finally started to transfer me. The same music played as the previous call, the same agent intro'd with the same "Health and life" script. I played along long enough for him to tell me that he would need to get my consent before proceeding and would play a recording for me. This recording eventually told me the name of the company, their website, email, and 800 number. I then ended the call and called the 800 number, which was not working.

Around 10 minutes or so after these calls, I began to receive calls from 800-773-3070. I picked up the first call and it was dead air for around 30 seconds before I disconnected. I called the number back and found that it was a toll-free number for the Texas Department of Insurance. I spoke to an agent there about the calls (I had received a few more while waiting on the TDI agent to pick up). The agent stated that TDI does not make any outbound calls from the 800 number and suggested that I report these calls. I received another call on the morning of 4/19 and was introduced to "Kevin Joseph," who did not provide a company name. Kevin said that they had received my information that I submitted the previous day about getting a subsidy. Kevin asked me to confirm the information and proceeded to use all of the (fake and unique) information I had given "Sam" the previous day.

I also received another call from "Sam" on 4/18 from another illegally spoofed number. This time, he did not give me his name initially or his company name. I ended up asking him and he said it was "Sam Cooper." I asked for the name of his company and he said it was, "Obamacare. Affordable Act Connectivity. Through the Subsidized Benefits. Ok?" I explained that the calls he had placed were illegal, that he had given a fake name and seemed to be pretending to be the government with 1st Texas' tacit approval, and offered him a wonderful settlement deal if he provided me with his real company name on the call. He explained that he didn't need the money. I explained that this would likely cost him thousands if we can't come to an agreement and I don't receive his company name on this call. I also explained that 1st Texas likely will not pay him, as there are various posts online from call centers mentioning issues with receiving payment. I again offered him a deal in return for his name and company name. He then told me, "Listen carefully sir. My name is Sam Cooper. So we are an independent broker." I told him this was a lie. We argued for a bit about this. He asked, "Are you interested in subsidies?" I told him, "No. I'm interested in getting this resolved." Sam then told me that I would be getting thousands in subsidies through his best friend who is in my area. He told me that the "main thing is, you need to listen to disclosure. You need to say I agree." He then continued to tell me all the things I need to say in order to qualify for subsidies. He told me that I would be "getting thousands from the subsidies. Much more than \$X" that I had offered him as a settlement amount if given his company name. I told him that I'd just end up suing them both for the TCPA violations. He told me that I didn't need to worry about that and only worry about agreeing to the disclaimer. He then transferred me to the same hold music and I was given the same "Health and life" intro. This time I immediately asked for the name of the call center. The 1st Texas agent seemed confused. I let him know that I was told that the company was "Obamacare" and asked if it was true. The agent told me that the call was about the open enrollment with the ACA. I tried asking this a few times and in a few ways. The agent agreed at least once that the call center was in fact "Obamacare." The agent seemed confused because "He's a telemarketer doing marketing." The person would not tell me the call centers name and outright refused many times, only offering an apology and saying "they're just trying to do their job."

I also requested the IDNC policies for both 1st Texas and the call center and told him that must be provided in writing upon request. I asked the agent if he would like my email address to send that to. He responded, "No. Just I'll remove you from the list for phone calls." I told him I wanted that as well, but I will be finding out the name of the call center as well. He continued to deny the information. He eventually disconnected the call.

I did some digging and found a few call centers that have claimed that they were not paid due to potentially similar claims, meaning that more people have also had this same issue and 1st Texas continues to not have adequate policies and practices in place. I believe that for the known calls and TDI spoofed calls that \$8,000 and the call center / lead broker's name and contact information is a more than fair agreement.

You are more than welcome to Google my name and "TCPA" to see that I take my right to privacy very seriously.

Kind regards,
Wes Newman
940-631-4523

✓ Sender notified by
Mailtrack

1st Texas Health & Life | Wes Newman DNC

support <support@1sttexasnational.com>
To: "Amjadadiwork@gmail.com" <Amjadadiwork@gmail.com>

Sun, Apr 21, 2024 at 1:34 PM

Kindest regards,

1st Texas National Health & Life

Billing & Cancellations: 888-261-2755

Email: Support@1stTexasNational.com

New Policies & Changes: 800-733-3070



----- Forwarded message -----

From: Wes Newman <wes.newman86@gmail.com>
Subject: 1st Texas Health & Life | Wes Newman DNC
Date: Sun, Apr 21, 2024, 10:52 AM
To: support <support@1sttexasnational.com>
Hi Aaron,

I am reaching out about calls I have received on my cell phone, 940-631-4523, which has been on the national DNC list since July 2005. I have provided details on the call that was transferred to your company below, though I have had many other calls using the same script and process that were not transferred for various reasons.

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Kind regards,
Wes Newman
940-631-4523

✓ Sender notified by
Mailtrack

1st Texas Health & Life | Wes Newman DNC

<support@1sttexasnational.com>

Tue, Apr 23, 2024 at 10:13 AM

To: "Wes Newman" <wes.newman86@gmail.com>

Good morning Mr. Newman,

I appreciate your reaching out and providing a detailed account of the calls you have received. After carefully reviewing your concerns dated April 21, 2024, I feel it is crucial to address them transparently and provide you with a complete picture from our side.

Firstly, I would like to extend my apologies for any calls you received that were unwanted. It is important to clarify that my agency's intent has always been to communicate solely with individuals who have demonstrated a clear interest in our services. For this reason, we make every marketing company we work with sign a compliance agreement requiring them to adhere to all US TCPA and DNC laws. A single violation of this contract constitutes grounds for immediate termination, and the vendor that sent your call, "P Tech," has been terminated.

Your interactions, which you detailed, involving calls from numbers that are not registered to us and agents not employed by our agency, suggests a serious and concerning misuse of telecommunications that is entirely unaffiliated with us.

Our agency made outbound calls for about 4 hours in the last 6 months. We generally only buy leads and don't make outbound calls. When we did, we strictly used our registered business numbers. One number you've referenced is ours and is registered to our business, 800-733-3070. **The number 800-773-3070 that you mentioned appears to be transposed from our number and has never been used by us and we do not engage in number spoofing.**

We have identified the vendor who sent us your number, P Tech. This vendor was terminated immediately after we discovered they violated the compliance agreement they signed with us on the 6th of last month, committing to follow all U.S. TCPA and DNC guidelines.

It's also important to mention that on the specific day in question, April 10th, we only made outbound calls for about 4 hours, following up on what were supposed to be compliant, opt-in leads. There have been no outbound calls from our agency since then. We are a small operation; it's just me and a part-time contractor. We do not employ any agents, including the ones you mentioned, and have no knowledge of the scenarios described in your correspondence.

On a personal note, the past three years have been incredibly challenging for my family. I have not turned a profit in that time, leading to drastic measures, including a two-week shutdown just six weeks ago due to lack of funds. Then again, 3 weeks ago, after negotiating reduced marketing costs and reopening, our business account stood at just a little over \$200 after paying my sole contractor, emphasizing the severe financial constraints we face. To get into insurance initially, I had to max out my credit cards—a situation I had not been in since before my bankruptcy in 2005. Consequently, I am currently unable to borrow further, adding to the severe financial constraints we face. I am also the primary provider for my three-year-old son Adam, my spouse Adriana, and my dependent mother Janette, who is terminally ill with an incurable blood cancer.

Given the uncertainty of continuing in the insurance industry, which has proven untenable long-term, I am actively seeking less risky business opportunities that do not involve dealing with potentially unscrupulous lead providers. The only asset I own is a problematic base model 2014 Honda CR-V. I rent without owning any property and am grappling with a \$50K debt to the IRS from 2020, the last time I turned a profit.

I share these personal details not to excuse any oversight on our part but to provide you with a candid view of our reality. I know that ensuring adherence to US TCPA and DNC laws are solely my responsibility if I'm attempting to conduct business in the US, but given the persistent constraints we've been in since deciding to get involved in insurance, meeting any settlement demand in the thousands is beyond our financial capacity at this moment. Nonetheless, we remain committed to finding a resolution and would be interested in a plan that is both fair and feasible under the present conditions.

Your understanding and any suggestions you might have for reaching a mutually acceptable solution are deeply appreciated. We are living week to week, and any offer we might make under our current financial state would likely not satisfy you, and I wish to avoid any offense or misunderstanding. Our future is truly in God's hands.

Thank you for your attention to this matter, and I look forward to your response.

Kindest regards,

1st Texas National Health & Life

Billing & Cancellations: 888-261-2755

Email: Support@1stTexasNational.com

New Policies & Changes: 800-733-3070



1st Texas Health & Life | Wes Newman DNC

Wes Newman <wes.newman86@gmail.com>

Tue, Apr 23, 2024 at 11:54 AM

To: "support@1sttexasnational.com" <support@1sttexasnational.com>

Hi Aaron,

Thank you for your email. Can you please provide me with the contact information for P Tech and/or your contact at that company? If I am able to work out an agreement with them then I will not need to hold you responsible for the calls. If you still owe them any money for leads that have been transferred to you, you may want to use that as leverage to encourage them to come to an agreement with me.

Let me know if that works for you.

Kind regards,
Wes



Sender notified by
[Mailtrack](#)

1st Texas Health & Life | Wes Newman DNC

<support@1sttexasnational.com>

To: "Wes Newman" <wes.newman86@gmail.com>

Mon, Apr 29, 2024 at 12:24 PM

Good afternoon Wes,

Thank you for your understanding and for considering an alternative approach to resolve this issue. I agree that involving P Tech directly could be a constructive step, given that the issues arose from their actions which were in breach of their contract with us.

Here are the contact details for P Tech, the lead provider we used:

- **Company Name:** P Tech
- **Authorized Representative:** Amjad Adil, CEO
- **Contact Email:** amjadadilwork@gmail.com
- **Office Address:** G/6/4 ST 85 PLOT 12, Pakistan
- **Phone Number:** +92 334 5055111

The contract they signed on March 6th includes the following binding agreements:

Term: This Agreement shall commence on 3/6/24 and continue until 01/15/2025, unless terminated earlier according to the terms herein.

Services: The Provider agrees to generate leads for the Client through telemarketing and digital lead campaigns. All leads shall be generated in compliance with the Telephone Consumer Protection Act (TCPA) and relevant regulations.

Compliance with TCPA: The Provider warrants that all lead generation and communication practices shall strictly adhere to the TCPA guidelines, which includes, but is not limited to:

- Obtaining prior express written consent for telemarketing calls.
- Maintaining a Do-Not-Call list and honoring the national DNC list.
- Providing appropriate caller identification.

Audit and Reporting: The Provider agrees to maintain records of compliance and shall provide the Client with monthly compliance reports. The Client reserves the right to audit the Provider's operations to ensure TCPA compliance.

Indemnification: The Provider agrees to indemnify and hold harmless the Client from any fines, penalties, claims, or actions arising from the Provider's failure to comply with TCPA guidelines.

Termination: This Agreement may be terminated by either party with a 1-day written notice. Immediate termination is permissible upon breach of TCPA compliance obligations.

P Tech explicitly agreed in our contract to adhere to all TCPA guidelines and to indemnify 1st Texas Health & Life LLC from any claims or penalties arising from failures to comply with such guidelines. This includes obtaining prior express written consent for calls, maintaining records, and respecting the DNC list.

If you need any more information to assist in your discussions with P Tech, please let me know, and I will provide whatever is necessary within the bounds of our legal obligations and privacy considerations.

I am hopeful that they will address and rectify the situation responsibly, given the clear terms of our agreement. If there is anything more I can do to facilitate this process, do not hesitate to ask.

kindest Regards,

Aaron Hansome
1st Texas National Health & Life

Billing & Cancellations: 888-261-2755

Email: Support@1stTexasNational.com

New Policies & Changes: 800-733-3070

